

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**

**WILLIE HENDERSON,
INDIVIDUALLY AND ON BEHALF OF
ALL OTHERS SIMILARLY SITUATED,**

Plaintiff

v.

GENERAL REVENUE CORPORATION,

And

PIONEER CREDIT RECOVERY, INC.

And

**NAVIENT PORTFOLIO MANAGEMENT,
LLC**

Defendants.

Civil Action No. 7:17-cv-00292

**PLAINTIFF'S MOTION FOR SANCTIONS FOR THE NAVIENT PORTFOLIO
MANAGEMENT, LLC 30(B)(6) WITNESS'S FAILURE TO PREPARE FOR AND
RESPOND TO THE 30(B)(6) DEPOSITION TOPICS AS NOTICED**

COMES NOW the Plaintiff, through counsel, and brings this motion as a result of Defendant Navient Portfolio Management, LLC's ("NPM") failure to adequately produce a witness for deposition with knowledge of the topic areas designated, in contravention of Rule 30(b)(6) of the Federal Rules of Civil Procedure. For this and the reasons fully set forth in the Memorandum in Support of this motion, Plaintiff hereby moves this Court to order sanctions upon NPM, by ordering NPM to pay all costs and attorney fees associated with the preparation

and taking of the 30(b)(6) deposition, and by striking the Defendants' Motion for Summary Judgment.

Respectfully submitted,

WILLIE HENDERSON, individually and on behalf
of all others similarly situated

By: /s/ John P. Fishwick, Jr.
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

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